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CHURCH OF SCIENTOLOGY INTERNATIONAL

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California Non-Profit Religious Organization, Plaintiff, vs. STEVEN FISHMAN and UWE GEERTZ, Defendants.	CASE NO. CV 91-6426 HLH(Tx) DECLARATION OF MICHAEL RINDER

I, Michael Rinder, hereby declare and state:

1. I am a Director of the Church of Scientology International (CSI). I was raised in the Scientology religion and have been a staff member in the Church since 1973. As such, I have personal knowledge of the facts set forth in this

(3)

declaration and if called as a witness, I could and would testify competently thereto.

2. As a Director of CSI, I have seen the filings made by the defendants and their lawyers in this case over the past six months.

3. Clearly, the focus of the defendants has not been on trying to disprove the defamation of which they were guilty or even to address issues related to the defamation. Instead, they have sought to turn this case into a witch hunt of the Scientology religion. In doing so, the paid witnesses in this case have specifically targeted the leader of the religion, David Miscavige, for their abusive lies and outrageous accusations.

4. Why would defendants and their counsel devote such an inordinate amount of attention to a non-party such as David Miscavige? Why would defendants' counsel's mercenary witness expose their lack of credibility so plainly by their resort to such outrageous and false allegations about him when he never had any involvement with Fishman, Geertz or this case? It is apparent that their effort to denigrate the leader of the religion is part of a campaign to create a false impression of, and thereby, denigrate Scientology. The lies that have been propagated in this case are vile beyond description. Their purpose, as made clear by Graham Berry himself, is to use them as a threat to extort funds from the Church. They have gotten away with this barrage of lies so far, and as a consequence, Berry now has the precedent of this case to use to create a future threat that he hopes will prompt CSI to pay to make him take his lies and go away.

5. David Miscavige prevented the Aznarans and Youngs from carrying out what would have been a catastrophic turn of events for the religion. Vicki Aznaran and Vaughn Young were involved in a scheme to pervert the scriptures of L. Ron Hubbard for their own profit. They were caught and stopped by David Miscavige. For this, every Scientologist is grateful. Even then, they were given the opportunity to redeem themselves within the Church. While they now rail against Mr. Miscavige and unleash the foulest lies about him their imaginations can concoct, any Scientologist would have thought it totally proper under the circumstances for those people to have been expelled from the Church without a chance for mercy. However, he gave them another chance. I know that he personally spent many hours with both Vicki Aznaran and Vaughn Young trying to help them regain their self-respect. They decided that rather than face those whom they had betrayed, that they would leave staff. Mr. Miscavige even helped the Aznarans to get themselves established in a new job. They were encouraged to continue in Scientology and treated civilly, as even they have testified elsewhere. Yet, all this being true, the Youngs and Aznarans still have a deep-seated hatred for Mr. Miscavige and have used this litigation to vent that hatred and to seek millions of dollars for their silence. There is no justifiable explanation for this, just as there is no explanation for savages dismembering missionaires who work for years helping them overcome poverty and disease. One can seek to help others and treat people with compassion and dignity, but the blind hatred harbored by a few cannot be restrained, no matter how hard one might try.

6. These people have gathered around them a few others who are bitter and harbor an unabiding resentment of Scientology and what it stands for and for their own failures in the Church. They view the Church as their "lottery ticket" and pursue their jackpot with lies and threats at the expense of the millions of happy and satisfied members who support the Church with their time and donations. The Aznarans and Youngs are joined in that pursuit by the likes of Hana Whitfield, Andre and Mary Tabayoyon, Larry Wollersheim, Steve Fishman and Gerry Armstrong. Though they either do not know David Miscavige, or had some remote contact with him many years ago, they are willing to make vindictive allegations, not based on personal knowledge or the truth, and defame him personally and as the leader of the religion. The tactic is as transparent as it is unconscionable -- spread venom in the hope that the victims of the hate campaign will eventually be forced to buy their silence so the Church can get on with its real purpose of expanding the Scientology religion and helping more people.

7. While these so-called experts have no personal knowledge concerning David Miscavige, I do. I have known and worked with him since 1976.

8. The sheer volume of despicable allegations made about him are intended to create the false impression that where there is smoke there is fire. These "witnesses" know only too well from their experience in the Church that the tactic of telling bigger and bolder lies has been a strategy employed against the Church in litigation for years. Tell enough lies, and make enough allegations, and an impression will be created which

accomplishes the end of destroying a reputation no matter how untrue the allegations are. Public figures are especially susceptible to this fraud as any study of history shows. Jesus Christ was crucified based on the false accusations of Judas Iscariot and the prejudice of the Romans.

9. Pontius Pilate listened to the lies about Jesus and the Christians. The Germans bought the lies about the Jews. Innocence does not prevent the lies from being told. And when those lies fall on ears opened by bigotry and deaf to the truth, irreparable harm is done. Defendants' tactics in this case are a study in this technique.

10. I know David Miscavige personally. As such I know him to be completely honest, and sincerely dedicated to helping people. For what he has done to expand our religion, he has the respect and admiration of millions of Scientologists. And for this same reason, he has earned the enmity and particular scorn of those with a vendetta against Scientology.

11. In the last decade, he has personally done more to ensure Scientology is standardly applied and made more widely known and available than any other single individual. After L. Ron Hubbard, the Founder of Scientology, passed away in 1986, the religion entered a new phase. While there will never be another L. Ron Hubbard, his death marked a time of potential disruption and upheaval, and Mr. Miscavige shouldered the responsibility for not only keeping the scriptures pure, but for guiding our religion into a time of great stability and rapid growth. He never sought personal power or aggrandizement; he was thrust into the position he currently holds precisely because he is so

dedicated to helping others through our religion. It is because he has demonstrated time and time again his integrity and selfless willingness to serve for the good of others that he enjoys the support of the staff and parishioners of the Scientology religion.

12. I have spoken to him often, and spent a considerable amount of time working with him on various matters from the positions I have held throughout the years. I know from my own observation that he works sixteen hours a day, seven days a week without respite for only one reason--his sincere dedication to bettering the lives of others. He and his wife live in a single motel-style room. He eats with the rest of the staff in the communal dining room, he drives his own car and carries his own bags. He regularly partakes in general group activities. It would shock most people that anyone would work so hard for so little material reward. It certainly gave pause to ABC News when they saw it with their own eyes.

13. Until 1981, David worked, like hundreds of other Church staff, in positions that dealt with the internal operations of the religion. Apart from the staff he dealt with directly as part of his duties, few knew who he was. I never heard an unkind word said about him. That changed when he took action to protect the future of the Church by taking over and disbanding the Guardian's Office. This story has been recounted before, but there are three things about it that bear repetition. First, what he did took an enormous amount of courage, for with no authority other than the moral authority of someone dedicated to the well-being of our Church, he overthrew what was at the time

the most feared and powerful group in Scientology (that they were feared is exactly why they had gone so far in contravention of Church policy as they were only answerable to themselves). Second, even after having achieved this feat, he did not seek a high profile position or attempt to "take over" the Church. He was happy to have those who were charged with running the Church continue to do so and have no part of it. Third, the overthrow of the Guardian's Office began what I have seen to be a virtually unending history of personal attacks against him. He didn't change, he merely became a known name and high-profile target.

14. Over the last thirteen years, I have seen a parade of personal attacks levelled at Mr. Miscavige which would have caused a less determined and less capable individual to give up and relinquish the position of "lightning rod" for anyone seeking to disrupt or destroy the Church. The first years saw attacks by government agencies, since proven totally false and unfounded, and documented by the government's own files gained through the Freedom of Information Act. These attacks went on for more than a decade. Government agencies amassed huge volumes of files on him personally, and were aided by civil litigants who also jumped on the bandwagon and targeted Mr. Miscavige with their spite and malevolence. And in the face of this, when it would have been so easy to give up and walk away, never to be vilified or attacked again, I have seen him persist, because what he was doing in Scientology is important and invaluable to all those who are helped by L. Ron Hubbard's technology. That determination was buttressed by the fact that none of the accusations made about him were true.

15. Mr. Miscavige is very approachable and friendly. He gives regular briefings to Scientology parishioners and staff in our Churches around the world. I estimate that he does such public briefings about 35 times a year. He stops and talks with the staff and public everywhere he goes. I have been with him on many occasions where he has stayed until the early morning hours to talk to individuals who remained after one of his briefings. It is remarkable how many people know him and approach him as a friend. Thousands write to him to request his assistance on a wide variety of topics, and he always takes the time to help or see that help is gotten.

16. It is David Miscavige who has been the driving force in getting every single book, and all the materials of the Scientology Grade Chart, fully and strictly in accordance with the writings of L. Ron Hubbard. Every Scientologist is eternally thankful for this because it means the full availability of the complete Scientology scriptures as written or spoken by Mr. Hubbard. He took no credit for this accomplishment, though those of us who are aware of the enormous amount of time he spent working to make this goal a reality know that the credit he so graciously gave to others, in fact, belonged to him.

17. Perhaps less important in his eyes than what he does internally in the Church, he has directly and personally given a new face to Scientology through his appearances in the media, responding eloquently and effectively to the same, discredited allegations that have been again dragged into this case.

18. And it is also David Miscavige who made the tax exemption by the IRS possible. It is he who personally walked

into the front lobby of the IRS National Headquarters and through two years of persistent work, ultimately brought about a peace with the IRS that had seemed impossible. But perhaps the most telling point is this: it was the IRS targeting individual Scientologists, merely because they were Scientologists, that motivated him the most in this endeavor. Again, he didn't take credit for this, he has told me many times that he felt it was his duty to all Scientologists to carry this off so they would be free to practice their religion just like those of other faiths.

19. I have observed through the years David's dedication to helping his fellow staff in the Church. It is he who has raised the standards and conditions for staff members by insisting on constantly upgraded living quarters, dining areas and other staff facilities. It is he who has insisted on staff enhancement programs, and recreational facilities being provided for the staff of the Church. Absurd allegations of slave labor being employed in the Church turn my stomach. I know the truth. They are lies, and those who utter them know them to be lies.

20. Mr. Miscavige has been the driving force in establishing the ideal school where my children have an environment free from drugs and crime. My children and their peers know him as a friend and think the world of him for his thoughtfulness and care for their well-being and their education.

21. I know his compassion from personal experience. While Vicki Aznaran makes cruel claims concerning the death of my infant daughter, she does not know what in fact occurred, or if she does, she is simply lying to try to create a false impression. In this time of great personal upset, David and his

wife Shelly supported my wife and me beyond what could possibly be expected by anyone--seeing to our personal needs, arranging for the most highly trained auditors to give us spiritual counselling, arranging plane fares and reservations, helping with the funeral arrangements and making it as easy as possible in every fashion imaginable for us to come through this upsetting time. I resent any implication that has been made to the contrary by Vicki Aznaran--her statements are beneath contempt.

22. On many occasions I have seen David go out of his way to help others. I well recall two times where I took ill and it was David who called the doctor and personally ensured that everything possible was done to help me recover. He contacted the doctor (both occasions were late at night and required tracking down doctors in the middle of the night) and ensured I was properly treated. It would have been easy for him to let someone else take care of me, but he did so personally, and would not leave or rest until the matter was resolved. These are things I will never forget.

23. I have seen him act in a similar fashion with many others. As I work with him often, and know many of the people that know him, I am aware of the high regard in which he is held by Scientologists and those he comes in contact with. I have never heard a negative statement made about him by anyone other than those who seek to extort money from the Church. It really is that simple.

24. Comparing what I know to what I read in the declarations of these paid "witnesses," makes the lies even more vivid and callous. There is no resemblance to the individual I know that

can be drawn from the innuendo, allegations and falsehoods that are written about him. To believe the statements of this tiny handful of spiteful apostates, in the face of such overwhelming evidence to the contrary, would be to listen to the testimony of Judas Iscariot. Their lies are no less bold, baldfaced or malicious.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11th day of April, 1994.

Michael Rinder

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